

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

| No. 2:15-MD-02641-DGC

| This Document Relates to All Actions

**JOINDER OF NIEMEYER, GREBEL & KRUSE, LLC**  
**IN THE RESPONSE OF FREESE & GOSS AND MATTHEWS & ASSOCIATES**  
**IN OPPOSITION TO PLAINTIFFS' MOTION SEEKING**  
**ESTABLISHMENT OF COMMON BENEFIT FEE AND EXPENSE**  
**ACCOUNTS PURSUANT TO CASE MANAGEMENT ORDER NO. 6 AND**  
**MODIFICATION OF CASE MANAGEMENT ORDER NO. 6.**

Niemeyer, Grebel & Kruse, LLC, on its own behalf and as the legal representative for plaintiffs with claims filed in the Bard IVC Filter MDL hereby joins in the relief and arguments set forth in the “Response in Opposition to Plaintiffs’ Motion Seeking Establishment of Common Benefit Fee and Expense Accounts Pursuant to Case Management Order No. 6 and Modification of Case Management Order No. 6” (CM/ECF Doc. 17367) filed by Freese & Goss and Matthews & Associates.

Dated: April 26, 2018.

Respectfully Submitted,

NIEMEYER, GREBEL & KRUSE, LLC

/s/ Michael S. Kruse  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of April, 2019, a copy of the foregoing pleading was filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access this filing through the Court's system and notice of this filing will be sent to these parties by operation of the Court's electronic filing system.

By: /s/ Michael S. Kruse